

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

JAMES RYALS, JR., et al.,

Plaintiffs,

v.

HIRERIGHT SOLUTIONS, INC., et al.,

Defendants.

Case No. 3:09cv625

O'NEAL HENDERSON,

Plaintiff,

v.

HIRERIGHT SOLUTIONS, INC., f/k/a USIS
COMMERCIAL SERVICES, INC.,

Defendant.

Case No. 3:11cv558

BAHIR SMITH,

Plaintiff,

v.

HIRERIGHT SOLUTIONS, INC., f/k/a USIS
COMMERCIAL SERVICES, INC.,

Defendant.

Case No. 3:11cv505

**MEMORANDUM IN SUPPORT OF CONSENT MOTION FOR
CONSOLIDATION FOR PURPOSES OF CLASS SETTLEMENT**

Plaintiffs, by counsel and with the consent of Defendants, jointly request that this Court consolidate for purposes of class settlement *Ryals, et al, v. HireRight Solutions, Inc., et al*, Case No. 3:09cv625, *Henderson v. HireRight Solutions, Inc. fka USIS Commercial Services, Inc.*,

Case No. 3:11cv558 and Smith v HireRight Solutions, Inc. fka USIS Commercial Services, Inc., Case No. 3:11cv505.

Fed. R. Civ. P. 42(a) provides that matters may be consolidated “[i]f actions before the court involve a common question of law or fact[.]” Certainly as is apparent from the filed complaints, the class action settlement agreement and the present motion, all three cases substantially overlap and involve countless common questions of both fact and law. Plaintiffs have reached agreement with Defendants on behalf of the classes they represent, to resolve the class action claims they bring in their respective cases, and accordingly, the parties have filed a Joint Motion for Preliminary Approval and will shortly file a Motion for Final Approval. The settlement is one agreement globally resolving all claims brought in the *Ryals*, *Henderson* and *Smith* cases, and to facilitate the settlement and to enable the parties to file their joint motion and supporting documentation together in one case, the parties respectfully request that the Court consolidate these cases for purposes of the class settlement and in accordance with the proposed Order attached to the present Motion.

JAMES RYALS, JR., et al,

/s/

Leonard A. Bennett, Esq.
VSB #37523
Attorney for Plaintiff
CONSUMER LITIGATION ASSOCIATES, P.C.
12515 Warwick Boulevard, Suite 100
Newport News, Virginia 23606
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
lenbennett@cox.net

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of September 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Amy Rachel Davis
Williams & Connolly LLP
725 12th St NW
Washington, DC 20005
202-434-5000
Fax: 202-434-5029
Email: adavis@wc.com

Dane Hal Butswinkas
Williams & Connolly LLP
725 12th St NW
Washington, DC 20005
(202) 434-5000

Daniel Patrick Shanahan
Williams & Connolly LLP
725 12th St NW
Washington, DC 20005
(202) 434-5174
Fax: (202) 434-5029
Email: dshanahan@wc.com

Frank G Bowman
Williams & Connolly LLP
725 Twelfth Street, N.W.
Washington, DC 20005
202-434-5000
Fax: 202-434-5029
Email: fbowman@wc.com

/s/
 Leonard A. Bennett, Esq.
 VSB #37523
 Attorney for Plaintiff
 CONSUMER LITIGATION ASSOCIATES, P.C.
 12515 Warwick Boulevard, Suite 100
 Newport News, Virginia 23606
 (757) 930-3660 - Telephone
 (757) 930-3662 – Facsimile
 lenbennett@cox.net